

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF  
MASSACHUSETTS

CRIMINAL NO. 04-10220-MLW

UNITED STATES OF AMERICA

vs.

YVILESSA GONZALEZ RODRIGUEZ

**MOTION TO CONTINUANCE SUPPRESSION HEARING  
FOR VERY BRIEF PERIOD AND AFFIDAVIT**

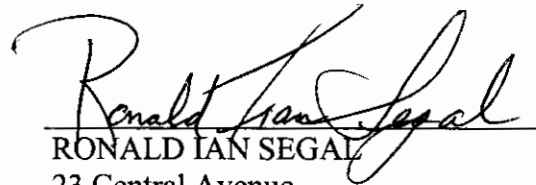
NOW comes the defendant in the above-entitled matter, by and through undersigned counsel, and respectfully moves this Honorable Court to continue the suppression hearing, presently scheduled on October 17, 2005 for a very brief period of time for reasons as follow.

1. Pursuant to this Honorable Court's Order, issued on September 19, 2005, your affiant visited the defendant at MCI-Framingham, accompanied by a Spanish Interpreter, and discussed the following issues with the defendant: (1). The defendant remains to desire that your affiant continue to represent her and, (2) that, despite a very thorough discussion of potential consequences (see reference to defendant's previous letter addressed to the Court), over the advice of undersigned counsel, the defendant continues to express her wish that the suppression hearing proceed as scheduled.

2. By Order of the Court, your affiant reported this circumstance telephonically, via voice mail, to Dennis O'Leary, Clerk, on September 28, 2005 the foregoing.
3. Thereafter, your affiant telephoned Assistant United States Attorney Maureen Hogan and reported same to her. Ms. Hogan indicated that the previously fixed date for the suppress hearing, to wit, October 5, 2005, was inconvenient for her due to an important medical appointment for her mother. Due to these circumstances, your affiant assented to said motion and suggested a number of potential rescheduling dates. Thereafter, your affiant had learned, via this Honorable Court's email transmission that Ms. Hogan's Motion to Continue was allowed and the matter stands rescheduled, day-to-day to October 17, 2005.
4. Despite your affiant's assent to Ms. Hogan's request, October 17, 2005 presents an incurable conflict with out-of-state matter in which your affiant is counsel, which matter has been previously rescheduled. Therefore, your affiant respectfully requests that the instant suppression hearing to further rescheduled to either October 18, 21, 26, or 28, 2005, if convenient with the Court and the Government.
5. Your affiant as attempted to telephone Ms. Hogan for the past three days without receipt of a return call to confer referring the same.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 30<sup>TH</sup> DAY  
OF SEPTEMBER, 2005,

Respectfully submitted,  
YVILESSÉ GONZALEZ RODRIGUEZ  
By her attorney,

A handwritten signature in black ink, appearing to read "Ronald Ian Segal", is written over a horizontal line.

RONALD IAN SEGAL

23 Central Avenue

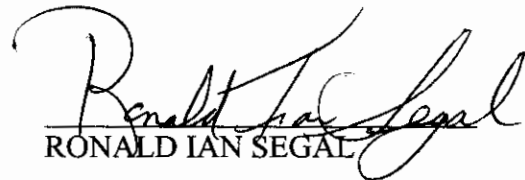
Suite 605

Lynn, MA 01901

(781) 599-2800

**CERTIFICATE OF SERVICE**

I, Ronald Ian Segal, Esquire, hereby certify that I have delivered copies of the within Motion To Continue Suppression Hearing For Very Brief Period And Affidavit, by mailing same, to Assistant United States Attorney Maureen Hogan, One Courthouse Way, Suite 9200, Boston, Massachusetts 02210, this 30<sup>th</sup> day of September, 2005.

  
RONALD IAN SEGAL